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15 *Attorneys for Petitioner Skipio Technologies*
16 *S.I. Ltd.*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN JOSE DIVISION**

20 In re: Application Pursuant to 28 U.S.C. § 1782
21 of Skipio Technologies S.I. Ltd.,

22 PETITIONER,

23 - To take the discovery of -

24 Broadcom Corporation,

25 RESPONDENT.

Case No. 5:24-mc-80167-EJD

**STIPULATION REGARDING
AUTHORIZATION OF SERVICE
PURSUANT TO 28 U.S.C. 1782;
[PROPOSED] ORDER**

1 Sckipio Technologies S.I. Ltd. (“Sckipio”) and Broadcom Corporation (“Broadcom”)
2 (together, the “Parties”), hereby stipulate and respectfully request that the Court order:

3 1. Sckipio to obtain discovery, pursuant to 28 U.S.C. §1782, from Broadcom in
4 accordance with the subpoenas marked as Exhibit A (Dkt. 1-01) and Exhibit B (Dkt. 1-02) in
5 Sckipio’s §1782 application (Dkt. 1);

6 2. Broadcom to respond to such subpoenas in accordance with, subject to, and without
7 waiver of its rights under the Federal Rules of Civil Procedure and the Rules of this Court;

8 3. Sckipio to submit copies of this Order and the subpoenas issued pursuant to this
9 Order with any submission of documents or information obtained pursuant to this Order in the
10 civil proceeding contemplated in Germany, subject to the terms of a Protective Order to be entered
11 by this Court; and

12 4. The parties to bear their own litigation costs and attorneys’ fees.
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Respectfully submitted,¹

Dated: August 22, 2024

By: /s/ John S. Goetz

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Attorney for Respondent
Broadcom Corporation

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date:

EDWARD J. DAVILA
United States District Judge